Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133

COMMENTS OF MISSION BROADCASTING, INC.

Mission Broadcasting, Inc. ("Mission") hereby submits these comments in response to the Commission's March 12, 2025 public notice in the captioned proceeding.[1] For the reasons that follow, Mission believes that few if any of the Commission's existing regulations better fit the bill for "deletion, deletion, deletion" than the agency's woefully outdated limitations on local broadcast television ownership.

Introduction

The Notice seeks public input "for the purpose of alleviating unnecessary regulatory burdens."[2] Among the policy factors on which the Commission seeks comment are "whether experience gained in the implementation of a given rule provides reason to believe that the rule is unnecessary or inappropriate"[3] and whether there are "existing rules that have outlived their usefulness . . . or which otherwise give rise to harms in light of technological and marketplace developments."[4]

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[1] Public Notice, "In re: Delete, Delete, Delete," GN Docket No. 25-133, DA 25-219 (Mar. 12, 2025) (the "Notice").

[2] *Id*. at 1.

[3] *Id*. at 3.

[4] *Id*.

FCC rules restricting broadcast television ownership in local markets fit these descriptions perfectly. Indeed, it is no accident that at its very outset, the broad-ranging Notice specifically cites Section 202(h) of the Communications Act—which mandates periodic review of the media ownership rules and repeal of those no longer in the public interest—as an example of the Commission's statutory obligation to "regularly review its rules to identify and eliminate those that are unnecessary in light of current circumstances."[5]

The FCC's restrictions on local television ownership fit squarely within both the Notice's factors for deletion and Section 202(h)'s standard for elimination. Mission's experience over nearly three decades of broadcast television operation, as discussed further below, proves that continued regulation of ownership in local television markets is neither "necessary" nor "appropriate," has "outlived [its] usefulness," and is creating "harms in light of technological and marketplace developments." The FCC's local television ownership rules, long overdue for reform, must be at the top of the list of regulations earmarked for "deletion" in this proceeding.

Discussion

Founded in 1996, Mission owns twenty-nine full power television stations in twenty-six markets. Mission has contracted with a third party, Nexstar Media Inc. ("Nexstar"), to provide certain services to Mission's stations. In the vast majority of its markets, Mission independently programs its stations while contracting with Nexstar for the provision of advertising sales, certain back-office functions and—most significantly—the production of local news and other programs specifically directed to viewers in Mission's communities.

Mission's model of "partnering" with Nexstar is a case study of the benefits that flow to local television audiences when multiple stations in the market—whether through common

[5] *Id*. at 1 & n.2 (citing Telecommunications Act of 1996, Pub. L. 104-104, § 202(h) (1996)).

ownership or service contract, and regardless of network affiliation—are able to achieve efficiencies by combining resources and functions. Mission's stations air over 500 hours of local news each week. Mission has launched local news for the first time on stations in small markets such as Utica, New York (DMA #171), Amarillo, Texas (DMA #132), Wichita Falls, Texas (DMA #150) and Terre Haute, Indiana (DMA #159). In many other markets, Mission has expanded morning newscasts and added afternoon and weekend newscasts on its stations as part of its overall effort to serve local communities. Moreover, for more than twenty years, Mission stations have aired focused, twice-annual public service campaigns. For an entire quarter, Mission's stations, in unison, air six to ten 30-second spots per day for three full months. These public service campaigns have covered a myriad of topics such as the dangers of teen vaping, Alzheimer's Disease, cyber-bullying, texting while driving, and organ donation. Mission recently concluded its first-quarter campaign focused on diabetes, in which its stations collectively aired over 17,000 PSAs. These extensive efforts demonstrate Mission's ongoing commitment to local news and public service—a commitment that would not be possible without Mission's ability to draw upon Nexstar's resources through its service agreements with Nexstar. Mission's business model is real-world proof of how both common ownership[6] and sharing of services between multiple television stations in a market produce economies of scale that result in more, and better, programming tailored to the needs of viewers in small and mid-sized communities.

In today's media environment, where consumers increasingly seek their news on the Internet and daily newspapers are folding or reducing service at a rapid pace, television stations are often the primary source of truly local news and information. This is certainly true for Mission's stations in many markets. Local television news reporters, unlike national online

[6] Mission also itself owns multiple television stations in two markets.

platforms, are on the ground in their communities, in touch with the events that concern their viewers most. And in times of weather and other emergencies, local television broadcasting delivers critical, life-saving information on a real-time basis without the need of an Internet connection.

But local news production is an expensive proposition—and as industry stakeholders have repeatedly shown in multiple quadrennial review proceedings over the last decade or more, television broadcasting is under serious economic pressure. Stations in a market can no longer be viewed as competing only among themselves for eyeballs and advertising revenue, as Big Tech platforms increasingly siphon local advertising dollars across all markets and video streaming has achieved ubiquity. As a result of these and other factors, television broadcasters are struggling to compete. They need scale to remain viable and continue to serve as sources of local news and information in the face of competition from unregulated tech behemoths and other multi-media conglomerates. Chairman Carr has long recognized this. In dissenting from the FCC's order in the 2018 quadrennial review, the Chairman correctly observed:

> In a diverse and growing media marketplace, we need to do everything we can to promote investment in trusted local news and information. Maintaining the regulatory status quo is not going to cut it. The FCC must enact significant reforms to help promote competition and increase access to the local news and information that is so vital yet is too often out of reach for those in rural and other underserved communities.[7]

In Mission's view, it is past time for the FCC to do just that. Over its decades as an owner and operator, Mission has witnessed how economies of scale between multiple television stations in a local market lead to more and better service to viewers in that market. In the 21st century media marketplace, there is no justifiable reason for restricting local television

[7] *Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Report and Order, 38 FCC Rcd 12782 (2023), Dissenting Statement of Commissioner Brendan Carr.

broadcasters from achieving such scale. Such restrictions have outlived their usefulness and are affirmatively harming broadcasters in light of technological and marketplace developments. Mission hopes that the Commission will place any and all limitations on local broadcast television ownership at the top of its "delete, delete, delete" list.

Respectfully submitted,

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